

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA	:	Hon. Michael A. Hammer, U.S.M.J.
	:	
v.	:	Mag. No. 16-4062
	:	
REINALDO RODRIGUEZ,	:	ORDER FOR CONTINUANCE
a/k/a "Money,"	:	
a/k/a "Mimo"	:	

This matter having come before the Court on the joint application of William E. Fitzpatrick, Acting United States Attorney for the District of New Jersey (by Sara F. Merin, Assistant United States Attorney), and Defendant Reinaldo Rodriguez (by Elizabeth Smith, Esq., appearing), for an order granting a continuance of the proceedings in the above-captioned matter; and Defendant being aware that he has the right to have the matter submitted to a grand jury within 30 days of the date of his arrest pursuant to Title 18 of the United States Code, Section 3161(b); and Defendant, through his attorney, having consented to the continuance; and eight prior continuances having been granted; and for good and sufficient cause shown,

IT IS THE FINDING OF THIS COURT that this action should be continued for the following reasons:

(1) Plea negotiations are currently in progress, and both the United States and Defendant desire additional time to negotiate a plea agreement, which would render trial of this matter unnecessary;

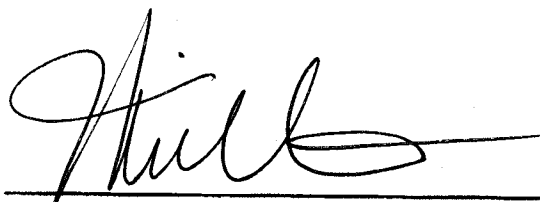
(2) Defendant has consented to the aforementioned continuance; and

(3) Pursuant to Title 18 of the United States Code, Section 3161(h)(7), the ends of justice served by granting the continuance outweigh the best interests of the public and Defendant in a speedy trial.

WHEREFORE, it is on this 12th day of September, 2017;

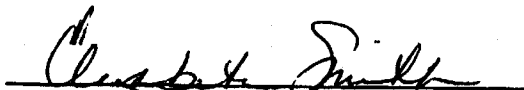
ORDERED that this action be, and it hereby is, continued from the date this Order is signed through and including November 15, 2017; and it is further

ORDERED that the period from the date this Order is signed through and including November 15, 2017 shall be excludable in computing time under the Speedy Trial Act of 1974.



HONORABLE MICHAEL A. HAMMER
United States Magistrate Judge

Form and entry consented to:



Elizabeth Smith, Esq.
Counsel for Defendant Reinaldo Rodriguez



Sara F. Merin
Assistant United States Attorney



Ronnell L. Wilson
Chief, OCDETF/Narcotics



John Gay
Deputy Chief, Criminal Division

TROY LAW, PLLC

ATTORNEYS / COUNSELORS AT LAW

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December 23, 2016

Via Fax

Hon. Michael A. Hammer.
United States Magistrate Judge
United States District Court
District of New Jersey
Martin Luther King Building
United States Courthouse
50 Walnut Street
Newark, NJ 07102

**Re: Motion to Reconsider Order Granting Withdrawal of Motion for
Conditional Certification
Ha, et al. v. Baumgart Café of Livingston, et al. No. 15-cv-05530**

Dear Judge Hammer:

This office represents the Plaintiffs in the above-referenced matter. I write to the Court to explain why I have submitted this motion and its accompanying exhibits through fax. I am an out-of-state attorney admitted before this court on a *pro hac vice* basis, and I am and have been dependent on New Jersey local counsel Lina Franco to file documents through the Court's ECF system.

Unfortunately, the relationship between myself and Ms. Franco has irreparably broken down after a series of events in this case undermined our mutual trust and produced severe disagreement as to how to best proceed. Crucially, Ms. Franco has made misrepresentations to the Court regarding me and my disposition toward the case. I have privately appealed to her to correct the record, but as she has refused, I am forced to do so myself. I understand that faxing this information to the Court is highly unusual and undertake it only as a last resort, having no other means to bring these issues to the Court's attention.

Respectfully submitted,

TROY LAW, PLLC
Attorney for Plaintiff

/s/ John Troy